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May 24, 2007

By Facsimile

Honorable Laura T. Swain
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 1670
New York, NY 10007

MEMO ENDORSED

IT IS ORDERED that counsel to whom this Memo Endorsement is sent is responsible for faxing or otherwise delivering promptly a copy to all counsel and unrepresented parties and filing a certificate of such service within 5 days from the date hereof. Do not fax such certification to Chambers.

Re: Vanacore v. Mattingly, et al.
07 CV 3579 (LTS) (MHD)

Dear Judge Swain:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to represent the defendants in this action. I write to respectfully request an extension of defendants' time to respond to the complaint from May 28, until June 28, 2007. This is defendants' first request for an extension of time to respond to the complaint. Plaintiff consents to this request.

Plaintiff, a Caseworker employed by the City of New York in the Administration of Children's Services ("ACS"), brings this action pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 1985, and the First and Fourteenth Amendments of the United States Constitutions, alleging that, from April 1999 to the present, the defendants conspired to engage in a continuous campaign to retaliate against plaintiff for his outspoken comments about ACS' reorganization into what is called the Title Series Program, in violation of his First Amendment right to free speech. Plaintiff further claims that the retaliation violated his substantive and procedural due process rights guaranteed by the Fourteenth Amendment.

An extension of defendants' time to respond to the complaint is needed to allow this office an opportunity to investigate the allegations set forth in the complaint, to obtain

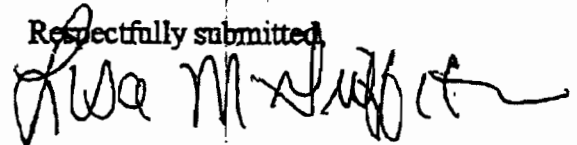
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documents relevant to the allegations, to ascertain whether the individually named defendants have been served, to conduct interviews with the individually named defendants, to determine any representation issues with individual defendants, and to prepare an appropriate response to the complaint.

For the foregoing reasons, defendants respectfully request an extension of time from May 28, until June 28, 2007 to respond to the complaint.

Thank you for your consideration of this request.

Respectfully submitted,




Lisa M. Griffith (LG0821)
Assistant Corporation Counsel

cc: Scott B. Schwartz, Esq.
Attorneys for Plaintiffs
(By Facsimile)

The request is granted.

SO ORDERED.


5/25/2007
LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE